

Filed by:

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ATTORNEY FOR MONTY WADE MOORE

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

IN RE:	§	BANKRUPTCY NO.
	§	
MONTY WADE MOORE	§	23-42765-ELM-13
	§	
DEBTOR,	§	CHAPTER 13

RESPONSE TO TRUSTEE’S MOTION TO DISMISS

(Relates to DN. 82)

TO THE HONORABLE EDWARD L. MORRIS
UNITED STATES BANKRUPTCY JUDGE:

Monty Wade Moore (“Mr. Moore”), the Debtor in this bankruptcy proceeding asks that the Court deny the Trustee’s Motion to Dismiss for failure to provide his 2023 tax return (DN. 82) and grant him additional time to provide the trustee with a copy of his return and would respectfully show the Court as follows:

1.

Mr. Moore filed this case on September 14, 2023.

2.

The Court confirmed (DN. 78) the Chapter 13 Plan of Reorganization (the “Plan”) proposed by Mr. Moore on June 7, 2024.

3.

The Trustee has asked the Court to Dismiss Mr. Moore's case because he has not yet provided a copy of his 2023 tax return.

4.

Mr. Moore is working diligently to complete his 2023 tax return and will provide a copy to the Trustee's office as soon as it is completed.

WHEREFORE, Mr. Moore prays that the Trustee's Motion be denied and that he be allowed additional time to complete and submit his 2023 tax return.

Respectfully submitted,

/s/Mark B. French

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**ATTORNEY FOR MONTY WADE
MOORE**

CERTIFICATE OF SERVICE

I, Mark B. French, do hereby certify that a true and correct copy of the Debtor's response to the Trustee's Motion to dismiss was served electronically or by first class mail on the Chapter 13 Trustee and the parties listed below on the date that the documents was filed electronically.

Tim Truman
Chapter 13 Trustee
6851 NE Loop 820
Suite 300
North Richland Hills, TX 76180

United States Trustee
1100 Commerce St., Room 976
Dallas, TX 75242-1496

Jack O'Boyle & Associates, PLLC
P.O. Box 815369
Dallas, Texas 75381

AIS Portfolio Services, LLC
Attn: Ally Bank Department
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118

City of Cleburne, Cleburne ISD, Rio Vista
ISD,
Johnson County
c/o EBONEY COBB
Perdue, Brandon, Fielder, Collins & Mott,
L.L.P.
500 E. Border Street, Suite 640
Arlington, Texas 76010

Rachel Crawley
Richard Henry
210 Marengo Street
Cleburne, TX 76033

Monty Moore
313 Olde Knoll Place
Rio Vista, TX 76093

And to all parties receiving notice through the Court's electronic noticing system.

/s/ Mark B. French
Mark B. French